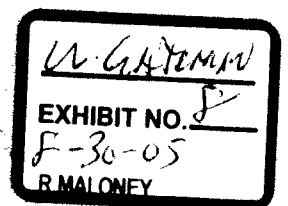




Goldman Environmental Consultants, Inc.



GEC Project No. 958-2080

**PHASE I ENVIRONMENTAL
SITE ASSESSMENT
190-200 UNION STREET
LYNN, MASSACHUSETTS**

May 29, 2002

Prepared For:

Envirotest Laboratories
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1.0 INTRODUCTION

Goldman Environmental Consultants, Inc. (GEC) of Braintree, Massachusetts has been retained by Envirotest Laboratories of Westwood, Massachusetts to evaluate environmental issues within the scope of ASTM Standard E1527-00, MGL Chapter 21E, and the Massachusetts Contingency Plan (MCP) for the property identified as 190-200 Union Street, Lynn, Massachusetts, hereafter referred to as the "Site". As described in the ASTM Standard, GEC's investigation was conducted to understand potential environmental conditions in order to satisfy due diligence requirements associated with a real estate transaction.

The purpose of GEC's Site assessment was to identify and define recognized environmental conditions arising from the use, treatment, storage, generation, disposal, or release of oil or hazardous materials (OHM) on the Site and abutting properties in accordance with ASTM Standard E1527-00. Emphasis was placed on determining the general presence of equipment likely to contain polychlorinated biphenyls (PCB), friable asbestos, and good housekeeping practices with respect to the handling of oil and hazardous materials. No sampling and analysis of asbestos containing materials was conducted. GEC had access to all readily accessible areas of the property however, the inspection was limited by a large open hole (former basement areas) being filled during the performance of this investigation and portions of the Site, which were covered beneath large piles of demolition debris. This report is intended for use by Envirotest Laboratories and its designee. GEC understands that Envirotest Laboratories is relying on the conclusions drawn from this investigation for evaluation of environmental liability in connection with the Site.

The results of this survey are based on the following. A list of sources of information is provided as Appendix A.

- A visual inspection of the Site and a review of pertinent records;
- A general survey of Site abutters and properties in the immediate vicinity;
- Discussions with Bill Gateman, Site owner;
- Interviews with, and/or records search at the City of Lynn Fire Department, Clerk's Office, Board of Health, Building Department, Engineering Department, and Assessor's Office;
- A records search at the Massachusetts Department of Environmental Protection (MADEP) at the Northeast Regional Office in Wilmington, Massachusetts;

- A records search of historical documents maintained at the State House Library in Boston, Massachusetts; and,
- An electronic search via Environmental FirstSearch (New England Datamap) of state and federal database files.

2.0 SITE DESCRIPTION

2.1 Site Location

The location of the Site is provided below. The Site is currently vacant. Prior to October 2001, the Site was occupied by a 70,000 square-foot department store. A fire destroyed the Site building in August 2001, and records indicate that between October 2001 and April 2002, the remainder of the Site building was torn down. Removal of demolition debris from the Site and filling of the former Site building basement areas is currently being conducted at the Site. The Site and vicinity are zoned "CBD" for commercial, business district. Refer to Figure 1 for the Site Locus.

Description	Location	Comments, References
Street Address	190-200 Union Street	
Town	Lynn	
County	Essex	5
State	Massachusetts	
USGS 7.5 Minute Quadrangle	Lynn	5
UTM Coordinates	north 47 03 193 meters east 3 40 315 meters	8
Latitude and Longitude	42°27' 60" north 70° 56' 32" west	8
Assessor's Map	Lots nos. 4, 5, 6, 7, 8, & 9 Block no. 613 Assessor's Map no. 19	1

2.2 Activity and Use Limitations

During the file search and Site interview, GEC attempted to determine whether an Activity and Use Limitation (AUL) or other institutional control, either in the form of an Environmental Notice, a Grant of Environmental Restriction, or an MADEP-implemented Environmental Restriction, had been filed for the Site pursuant to MGL Chapter 21E and the MCP [310 CMR 40.1000]. The following sources of information were used to determine whether an AUL exists for the Site: (1) interview with the Site owner, Bill Gateman; (2) the MADEP for documentation on Response Action Outcome Statements, a Notice of Activity and Use Limitations, Grant of Environmental

Restrictions, and an Environmental Restriction; and (3) local agencies consisting of the Board of Health, and Building Department.

Activity and Use Limitations	Yes / No	Description
Were any Activity and Use Limitations identified for the Site?	No	

2.3 Physiographic Setting

The Site is situated at approximately forty (40) feet above Mean Sea Level. The Site is currently undergoing demolition removal and filling activities, therefore, the grade of the Site is continuously changing. The surrounding vicinity is relatively level grading downward slightly from north to south. According to National Flood Insurance Map, Community Panel # 250088 0006B, dated February 1, 1985, the property lies in an area of minimal flooding (Zone C).

Goldfish Pond and Lynn Harbor are situated approximately 0.4-miles and 0.5-miles east and southwest of the Site respectively. Open spaces are located approximately 500-feet northeast and southeast of the Site.

Feature	Direction of Flow / Likely Eventual Discharge Point	References
Regional Surface Drainage	South toward catch basins located along Union Street and Ellis Street.	FO
Site Surface Drainage	South toward catch basins located along Union Street and Ellis Street.	FO
Regional Groundwater Flow	Southwest toward Lynn Harbor.	FO, Q
Site Groundwater Flow	Southwest toward Lynn Harbor.	FO, Q

Reference: FO = Field observation; Q = Interpretation of USGS 7.5 minute quadrangle; SSI (ref. no.) = Subsurface investigation with reference number of the report.

Due to temporal and spatial variations, subsurface conditions, and possible man-made obstructions, GEC is unable to determine definitively local groundwater flow direction with the available information.

2.4 Site Description

The Site is located in a commercial business district of Lynn, and is bound to the north, west, and east by School Street, Union Street, and Ellis Street respectively. A senior center, music store, hair-braiding store, and restaurant abut the Site to the south. Commercial stores, restaurants, parking areas, a jeweler, a realtor, a career center, and an

elder service plan facility are located north, west, and east of the Site beyond abutting roadways.

The Site is currently vacant. The Site was formerly occupied by a 70,000 square-foot department store building, which was destroyed in a fire in August 2001. The remainder of the building was removed between October 2001 and April 2002. Asbestos abatement and demolition activities were recently conducted at the Site at the time of building removal. Filling and grading activities are currently being conducted at the Site to fill in the former basement areas and return the Site to a level grade.

2.4.1 Structures, Improvements and Land Area

The 0.97-acre Site is currently not occupied by any buildings. Prior to October 2001, the Site was occupied by one 70,000 square-foot building. The building was destroyed in a fire in August 2001. Since October 2001, on-Site asbestos abatement activities have been conducted by SCS Environmental under Envirotech Laboratory's direction, and on-Site demolition activities have been conducted by Robert's Dismantling & Recycling. Based on conversations with Mr. Gateman, all demolition debris has been or will be hauled off-Site by Robert's Dismantling & Recycling. Currently the former basement areas are being filled to grade.

Currently the Site is vacant, with a parking area located on the southeast portion of the Site. Refer to Figure 2 for the Site Plan.

2.4.2 Utilities

Based on conversations with Mr. Gateman, the former Site building was serviced with natural gas heat and municipal water and sewer. Mr. Gateman stated that to his knowledge no water wells of any type are located on the Site. Based on records maintained at the City of Lynn Assessor's office and fire department, the former Site building was historically heated with fuel oil. Refer to Section 5.1 for information regarding former aboveground and underground storage tanks.

No heating, cooling, and alternative or emergency energy sources are currently used at the Site.

2.5 Description of Abutting Properties

GEC conducted a limited visual reconnaissance of abutting and nearby properties to evaluate the potential for releases of OHM to impact the Site. Roadways and other properties abutting or proximal to the Site are described below. Based on the

reconnaissance, no evidence of improperly stored or disposed OHM, staining or spills were observed at abutting or nearby properties, unless described below.

Abutting Properties

Direction	Distance (Miles)	Identity and Address of Property or Roadway	Current Property Usage	Operations / OHM usage, treatment, generation, storage or disposal
North	Abutter	School Street	Roadway	
South	Abutter	224-226 Union Street	Hair Braiding Store, Music Store, and Restaurant	Likely limited to commercial quantities of cleaners, paints, and similar maintenance supplies
South	Abutter	8-18 Silsbee Street	Senior Center	Likely limited to commercial quantities of cleaners, paints, and similar maintenance supplies
East	Abutter	Ellis Street	Roadway	
West	Abutter	Union Street	Roadway	
North	Across School Street	180 Union Street	Restaurant and drug store	Likely limited to commercial quantities of cleaners, paints, and similar maintenance supplies
North	Across School Street	School Street	Parking Area	
North	Across School Street	20 School Street	Elder Service Plan	Likely limited to commercial quantities of cleaners, paints, and similar maintenance supplies
East	Across Ellis Street	Ellis Street	City of Lynn off-street parking	
West	Across Union Street	189-253 Union Street	Commercial stores, restaurants, jewelers, a realtor, and a gift shop.	Likely limited to commercial quantities of cleaners, paints, and similar maintenance supplies
Northwest	Across Union Street	181 Union Street	Greater Lynn Career Center	Property is listed as a state spill site. Release was related to an upgradient property. Likely limited to commercial quantities of cleaners, paints, and similar maintenance supplies.

2.6 Proximity of Environmental Resource Areas

Environmental resource areas include wetlands, surface waters, Areas of Critical Environmental Concern (ACEC), habitats of Threatened or Endangered Species, or Species of Special Concern, Certified Vernal Pools, Potentially Productive Aquifers (PPA), Sole Source Aquifers (SSA), Interim Wellhead Protection Areas (IWPA) or Zone II's of public water supply wells, or private water supply wells. No known resource areas were identified within approximately 1,000 feet of the Site.

2.7 Land Use History

The land use history for the Site and vicinity was developed based on the following sources of information: interviews with Mr. Gateman, owner of the Site; the City of Lynn Assessor's Office; Sanborn Atlases reviewed at the State House Library; City Directories (e.g., Polk) reviewed at the State House Library; and the City of Lynn Building Department. An attempt was made to develop the land use history back to 1890. These sources were consulted to determine whether evidence of an historical recognized environmental condition exists for the Site.

Mr. Gateman stated that he is the current owner of the Site. However, based on conversations with personnel at the City of Lynn Assessor's Office, the current Site ownership is under dispute. Assessor's records indicate that the River of Life Miracle Ministry is the current owner as recorded in a deed dated September 28, 1998 (book 15118, page 270). City of Lynn assessor personnel indicate that filings have been submitted for a foreclosure on this deed, however, the foreclosure had not gone through prior to the fire in August 2001.

Based on a review of Sanborn Maps several buildings historically occupied the Site prior to the existence of the 70,000-square foot building that was razed between October 2001 and April 2002.

Refer to the following table for details of the Site's history based on a review of Sanborn Maps and City Directories maintained at the Massachusetts State House Special Collections Library and a review of records maintained by the City of Lynn Building Department. Sanborn Maps depicting former Site buildings are included as Figures 3a through 3e.

Site History

Date / Period	Owner	Occupant	Operations / OHM usage, treatment, generation, storage or disposal	References
?-current	William Gateman	Commercial Store	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	3
9/28/98-?	River of Life Miracle Ministries	Based on conversations with Mr. Gateman, prior to the August 2001 fire, the property had been occupied by commercial stores for approximately the past fifty years.	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	1, 3
12/24/96-9/28/98	Two Hundred Union Street Realty Trust, William Gateman Trustee	Based on conversations with Mr. Gateman, prior to the August 2001 fire, the property had been occupied by commercial stores for approximately the past fifty years.	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	1, 3
10/12/93-12/24/96	Cypress Nominee Trust, Fariborz Maseeh Trustee	Based on conversations with Mr. Gateman, prior to the August 2001 fire, the property had been occupied by commercial stores for approximately the past fifty years.	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	1, 3
?-10/12/93	Federal Deposit Insurance Corporation	Based on conversations with Mr. Gateman, prior to the August 2001 fire, the property had been occupied by commercial stores for approximately the past fifty years.	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	1, 3
1967-1979		Hoffman's Inc. (women's clothing) and Residences	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products. Fire records indicate that in 1967 buildings located on the Site were remodeled into one large store.	2, 11, 13
1962-1966		Sears & Roebuck	Fire records indicate Sears & Roebuck stored 300-400 gallons lubricating oil, 400 gallons paints, and 400 gallons alcohol	2

Date / Period	Owner	Occupant	Operations / OHM usage, treatment, generation, storage or disposal	References
1958		Foster's Shoe Store	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	2
1957	Max & Helene N. Hoffman	Leed's Shoes, Darcy Shoe Corp, Liquor Store, Camp Parker Hall, Hoffman's Store, bowling alley, and residences.	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	11, 13
1955		Hoffman's Storage	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	2
1947		Shadowland Dance Hall	Likely limited to consumer quantities of cleaners, paints, and similar maintenance products.	2
1946		Leed's Shoes, Darcy Shoe Corp., Liquor Store, Camp Parker Hall, Lee Cleansers, and residences.	OHM use at the cleaners may have included trichloroethylene and tetrachloroethylene if dry cleaning activities were conducted on-Site.	13
1944		American Legion Post 6	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	2
1940		Leed's Shoes, Darcy Shoe Corp., Liquor Store, Lee Cleansers, Marion's Dress Shop, a fruit store, residences, and an undertaker.	OHM use at the cleaners may have included trichloroethylene and tetrachloroethylene if dry cleaning activities were conducted on-Site. Additionally, chemicals used in embalming would have likely been used on-Site by the undertaker.	2, 13
1936		Virginia Beauty Shop and Lynn Institution for Savings, Eagle Bowling Allies	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	2

Date / Period	Owner	Occupant	Operations / OHM usage, treatment, generation, storage or disposal	References
1935		Leed's Shoes, Darcy Shoe Corp., Lorraine Coffee Co., Lovells Shoe Factory, residences, and an undertaker.	Chemicals used in embalming would have likely been used on-Site by the undertaker.	13
1934		Joseph O'Connor Bowling Alleys	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	2
1933		Shea Cleaners & Dyers	Chemicals used in dry cleaning such as trichloroethylene and tetrachloroethylene may have been used on Site.	2
1931		Swiss Cleaners	Chemicals used in dry cleaning such as trichloroethylene and tetrachloroethylene may have been used on Site.	2
1929		Restaurant, Lovells Shoe Factory, United Cash Market, jewelry store, residences, and an undertaker.	Chemicals used in embalming would have likely been used on-Site by the undertaker. Fire records indicate permit to store 1-pint gasoline, 1-pint machinery oil, and 1-pint clock oil.	2, 13
1923		Vacant stores and residences.	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	13
1917		Lovells Shoe Factory, tailor, provisions, vacant stores, and residences.	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	13
1893		Livery, Chinese Laundry, stores, bakery, barbershop, and residences.	OHM use at the cleaners may have included trichloroethylene and tetrachloroethylene if dry cleaning activities were conducted on-Site.	12
1887		Stores, bakery, boarding house, and residences.	Likely limited to commercial quantities of cleaners, paints, and similar maintenance products.	12

The Site vicinity was first developed prior to 1887. Prior to development, use of the land is not known. Based on the available information, the predominant land use since development has been residential and commercial businesses, including shoe stores, liquor stores, an undertaker, cleaners, bakeries, and a bowling alley. Based on a review of Sanborn Maps and City Directories maintained at the Massachusetts State House Special Collections Library land use histories for the Site vicinity, have been stores, residential properties, a church, a movie theatre, parking lots, and a dry cleaners.

2.8 Inspection of Building Interiors

On May 2, 2002, GEC conducted a visual inspection of the Site grounds. GEC was accompanied by Bill Gateman the Site owner. No buildings occupy the Site, and therefore no buildings were inspected. During the inspection, GEC interviewed Mr. Gateman for information pertaining to Site history, facility operations, and waste handling practices of the former Site building, which was destroyed in a fire in August 2001.

2.9 Inspection of Building Exterior

GEC inspected the Site grounds to determine whether evidence suggests that OHM may have been used, treated, generated, stored or released at the Site. Other information pertaining to the Site grounds can be found throughout the report.

Building Exterior	Yes / No	Comments
Were any monitoring wells or other monitoring devices observed?	No	Mr. Gateman stated that to his knowledge, no water wells of any type are located on the Site.
Was there evidence of surficial staining?	No	Surficial soils were observed where accessible, including within excavation and grading areas. No evidence of a release was observed.
Did vegetation appear stressed?		There is currently no vegetation present at the Site.
Were there soil piles or evidence of filling activities?	Yes	Based on a review of records maintained by the City of Lynn Building Department, the building destroyed in the August 2001 fire was demolished in October 2001. Based on conversations with Mr. Gateman, during the demolition of the Site building, asbestos abatement activities were conducted. Mr. Gateman stated that all building materials containing asbestos were removed from the Site and disposed of off-Site. Additionally all demolition debris was hauled off-Site or is in the process of being hauled off-Site for proper disposal. The Site is currently undergoing filling activities to fill in the Site building's former-basement areas.

Building Exterior	Yes / No	Comments
Was there any evidence of engineering controls installed to eliminate or reduce the potential for exposure to hazardous substances in soil or groundwater (capping, slurry walls, or point of use water treatment)?	No	

3.0 REGULATORY HISTORY

GEC conducted telephone interviews and/or file searches with the Massachusetts Department of Environmental Protection (MADEP) and agencies of the City of Lynn relative to the Site on May 2, 2002 and May 6, 2002, respectively. State and federal databases were accessed during an Environmental FirstSearch run on April 25, 2002 through New England Datamap Technology Corporation's database program. The Environmental FirstSearch Report is attached as Appendix B. GEC makes no representations on the accuracy of the information provided by third parties nor did GEC conduct any further independent investigations of spill incidents or sites noted herein.

3.1 Site Regulatory History

Provided below is a summary of the file search findings for the Site. Case incident, Site, or other identifying numbers are provided in the chart.

Subject Site

Is the Site on any of the following lists?	Yes / No	Description	References
Federal NPL list	No		8
Federal CERCLIS list	No		8
Federal CERCLIS NFRAP list	No		8
Federal RCRA CORRACTS facilities list	No		8
Federal RCRA non-CORRACTS TSD facilities list	No		8
Federal RCRA Generators list	No		8
Federal ERNS list	No		8
State list of hazardous waste sites	No		8
State spill or release incidents list, prior to 1990	No		8
State spill or release incidents list, since 1990	No		8
Registered UST list	No		8
State landfill and/or solid waste disposal site list	No		8

Local Agencies Information regarding environmental conditions at the Site	Yes / No	Description
Board of Health	No	
Fire Department		Based on conversations with Inspector R.E. Hultgren of the City of Lynn Fire Department, the City of Lynn Fire Department had no records for the address 190-200 Union Street, however, their records indicate the former Hoffman Building as 200-218 Union Street. The City of Lynn Fire Department records indicated multiple AGTs and USTs associated with 200-218 Union Street. Refer to section 5.1 for further information.
Town Clerk	No	
Building Department	No	

3.2 Site Vicinity Regulatory History

Provided below is a summary of the file search findings for properties located in the vicinity of the Site. Further information on incidents occurring within 0.2 miles of the Site is provided subsequent to this table, and within Appendix B.

Site Vicinity

Are there any of the following incidents?	Yes / No	Number of Incidents	References
Federal NPL sites within 1.0 miles of the Site	No		8
Federal CERCLIS list sites within 0.5 miles of the Site	Yes	1	8
Federal CERCLIS NFRAP list at adjoining properties	No		8
Federal RCRA CORRACTS facilities list within 1.0 miles of the Site	Yes	1	8
Federal RCRA non-CORRACTS TSD facilities within 0.5 miles of the Site	No		8
Federal RCRA Generators list at adjoining properties	No		8
Any properties within 1.0 mile of the Site listed on the State list of hazardous waste sites	Yes	21	8
Any State spill or release incidents reported for locations within 0.5 miles of the Site, prior to 1990	Yes	5	8
Any State spill or release incidents reported for locations within 0.5 miles of the Site, since 1990	Yes	71	8
Any registered USTs at adjoining properties	No		8
Any properties within 0.5 miles of the Site on the State active or inactive landfill list	No		8

Provided below is additional available information regarding properties identified on any of the above lists and located within 0.2 miles of the Site. Case incident, site, or

other identifying numbers are provided in the chart. For each disposal site or spill incident the status of the incident, nature and magnitude of the release is provided, when available. For RCRA generators, RCRA treatment, storage or disposal facilities, and NPDES permitted facilities, the status of each is provided as well as whether a notice of violation is indicated in the Environmental FirstSearch Report. For underground storage tanks (USTs), the number, age, capacity, and contents of the tanks are provided, whether the tanks are removed or closed, and whether there was any indication of leakage (based on a subsurface investigation or failed tightness test).

Property Identification, Address, and Direction and Distance from the Site	Incident Description
181 Union Street North across Union Street Likely crossgradient of the Site	<ul style="list-style-type: none"> State spill site 3-1851. In 1988 a site investigation was conducted on the property. Groundwater samples were collected from monitoring wells installed at the property. Groundwater analytical results were compared to GW-1 standards. Chloroform was detected at concentrations above the GW-1 standard, and the Massachusetts Department of Environmental Protection (MADEP) was notified. The property was listed as a Location To Be Investigated (LTBI) in 1989. In 1991 further investigations were conducted at the property. From the investigation it was concluded that contamination was the result of an adjacent property (ACR Electronics, Inc.) and that no further actions were warranted because the owner had no control over the source of the contamination. In 1993 additional investigations were conducted at the property. Groundwater results were no longer compared to GW-1 standards, instead they were compared to GW-2 standards. During the 1993 investigation all groundwater analytical results were below the GW-2 standards. Since no remedial actions had been conducted at the property, a Class B-1 Response Action Outcome (RAO) was filed for the property along with a Licensed Site Professional (LSP) Opinion on March 4, 1997.
Union Cleaners & Tailors 169 Union Street 200-feet northwest Likely crossgradient of the Site	<ul style="list-style-type: none"> RCRA Generator and FINDS site MAD980734412. Small quantity generator, generates 100-1,000 kg/month of hazardous waste.
ACR Electronics, Inc. 17 Joyce Street 500-feet northwest Likely crossgradient of the Site	<ul style="list-style-type: none"> RCRA NLR site MAD019448729. Property is no longer regulated.
18 Joyce Street 500-feet north Likely cross gradient of the Site	<ul style="list-style-type: none"> State spill site N90-1050. Dumping of an unknown amount of gasoline on 6/29/90. Incident is closed.

Property Identification, Address, and Direction and Distance from the Site	Incident Description
Mulberry Street 305-311 Union Street 800-feet southwest Likely downgradient of the Site	<ul style="list-style-type: none"> State site 3-13920. In February 1996 an UST located below a basement slab was cleaned out and abandoned in place. Prior to abandonment soil samples were collected from holes drilled through the bottom of the tank. Analytical results indicated that TPH concentrations exceeded RCS-2 standards. A 120-day notification was made to the MADEP on June 20, 1996. On March 26, 1997 a RAM Plan was submitted for the removal of the tank and associated contaminated soils. On June 20, 1997 a Phase I Site Investigation Report and Tier Classification was submitted for the property, classifying the property as a Tier II site. On September 3, 1997 a RAM Completion and RAO were submitted for the property. The UST and 277 tons of contaminated soil were removed, and confirmatory soil samples were collected from within the excavation. A Method 3 Risk Assessment was conducted on the property and an Activity and Use Limitation (AUL) was implemented to ensure a condition of no significant risk. A Class A-3 RAO was submitted for the property.
Apartment Building 26-28 Essex Circle 900-feet northwest Likely crossgradient of the Site	<ul style="list-style-type: none"> State spill site 3-12328. Release of No. 2 fuel oil from lines associated with an UST on January 28, 1995 triggering a 2-hour notification requirement. The leaking line was replaced, and an IRA Plan for the excavation of 5-10 cubic yards of soil was submitted on August 16, 1995. Following the IRA Plan submittal, 10-18 tons of contaminated soil was excavated. In March 1996 an IRA Completion and Class A-2 RAO was submitted for the property.
28 Mount Vernon 900-feet southeast Likely crossgradient of the Site	<ul style="list-style-type: none"> State spill site N90-0511. Release of an unknown amount of an unknown substance on 4/6/90. Incident is closed.
Residence 50 Green Street 900-feet southeast Likely crossgradient of the Site	<ul style="list-style-type: none"> State spill site N88-0957. Release of an unknown amount of petroleum on 6/30/88. Incident is closed.
Daily Evening Item 38 Exchange Street 1,000-feet southwest Likely downgradient of the Site	<ul style="list-style-type: none"> RCRA Generator MAD985294545. Small quantity generator. Generates 100-1,000 kg/month of hazardous waste.
A&K 50 High Street 1,000-feet northwest Likely crossgradient of the Site	<ul style="list-style-type: none"> RCRA Generator MAD107909939. Property is no longer regulated.

Property Identification, Address, and Direction and Distance from the Site	Incident Description
USPS Vehicle Maintenance Facility 96 Buffum Street 1,000-feet southwest Likely downgradient of the Site	<ul style="list-style-type: none"> • RCRA Generator site MA8180410286. Very small quantity generator. Generates less than 100 kg/month of hazardous waste. • Registered UST site 0-015717. One in use 6,000-gallon gasoline UST. Installation date not know. • State spill site N91-0468. Release of an unknown amount of hydraulic fluid on 2/28/91. Incident is closed. • State spill site 3-13275 and 3-3618. On March 23, 1991 a Phase I Limited Subsurface Investigation was submitted for the property. Five prior releases were identified as having occurred at the property. All prior releases were identified as having been addressed with the exception of one hydraulic oil release from a former underground hydraulic vehicle lift. This release was assigned RTN 3-13275. In March of 1993 a Waiver of Approvals Application was submitted to the MADEP, which was approved on October 20, 1993. Following, a Request for Approval of RAM Plan was submitted on May 31, 1994. A RAM Completion Report was then submitted on July 27, 1994. On June 30, 1995 a Phase II Scope of Work (SOW) was submitted. During Phase II investigation, an unknown hydrocarbons was detected in soil. This area was assigned RTN 3-13275 and was linked to RTN 3-3618. On December 18, 1996 a Phase II Comprehensive Site Investigation Report with a Method 3 Risk Characterization and Class A-2 RAO was submitted for the property.

Provided below is information obtained from local agencies regarding nearby properties.

Local Agencies Information regarding environmental conditions at properties within 0.2 miles of the Site	Yes / No	Description
Board of Health	No	
Fire Department	No	
Town Clerk	No	
Building Department	No	

4.0 PREVIOUS REPORTS

GEC was provided no reports of the Site for review.

5.0 SITE CONDITION

5.1 Storage Tanks

During the Site inspection, GEC searched for evidence of the current and historic use of above ground storage tanks (AGT) and USTs, and interviewed Mr. Gateman regarding the current or historic use of storage tanks at the Site. GEC searched for the features or situations, which could indicate the current or prior existence of AGTs or USTs.

Storage Tanks Do any of the following features or conditions exist at the Site?	Yes / No	Description
Interview with Site contact, who indicated the presence of USTs or AGTs	Yes	Mr. Gateman indicated that prior to his ownership of the Site USTs were present at the Site. Mr. Gateman stated that prior to purchasing the property he had viewed documentation of the removal of the former USTs. Mr. Gateman also indicated that AGTs were removed from the basement of the Site building during the demolition and asbestos abatement. Mr. Gateman did not have knowledge of the number or sizes of the former AGTs or USTs.
On-Site operations, which suggest the use of USTs or AGTs	No	AGTs and USTs mentioned by Mr. Gateman would likely have been utilized historically to heat the on Site buildings and may have also been associated with the use of a portion of the property as a dry cleaning establishment..
Existing or sealed fill and vent pipes	No	
Scarring on interior or exterior building walls	No	The former building has been demolished and removed from the Site.
Abandoned or existing fuel-oil furnaces	No	
Surficial stains or odors in the basement or along the foundation of the building	No	
Concrete pads or pump islands	No	
Vaults	No	
Floor mounts	No	
Scarred pavement or other evidence of prior excavations	No	
Other	No	

Based on conversations with Mr. Gateman no USTs or AGTs are currently located at the Site.

Based on records obtained from the City of Lynn Fire Department, AGTs and USTs have been utilized historically at the Site. The current address of the Site is 190-200 Union Street, however based on conversations with Inspector R.E. Hultgren, records maintained by the City of Lynn Fire Department identify the Site as 200-218 Union

Street (addresses consistent with historic Sanborn Maps). The table below summarizes information obtained from the City of Lynn Fire Department regarding current and historic use of AGTs and USTs at the Site.

Date	Location	Description
10/05/1950	208 Union Street	One 275-gallon fuel oil tank in basement (AGT).
8/28/1939	214 Union Street	Three 275-gallon fuel oil tanks in basement (AGTs).
12/09/1966	216 Union Street	One 500-gallon fuel oil UST. Two 275-gallon tanks removed.
2/20/1970	216 Union Street	Two 275-gallon fuel oil tanks in boiler room (AGTs).
5/10/1967	200-218 Union Street	Two separate boilers, underground fuel oil tank. Ordered tanks removed from rear of store (old Sears bldg.).
11/03/1969	200-218 Union Street	Ordered third fuel oil tank removed out of boiler room #2. Ordered a dike built around fuel oil tanks in room #1.
2/20/1970	200-218 Union Street	Third fuel oil tank removed and dike built. Issued two permits for two 275-gallon fuel oil tanks (one at 200 Union St. and one at 216 Union St.).
3/08/1985	200-218 Union Street	Tanks pumped out by Pollution Control Unlimited.
3/14/1985	200-218 Union Street	Four tanks removed from rear parking lot on corner of Ellis and School Streets. (one 3,000-gallon UST; two 2,000-gallon USTs; one 500-gallon UST) All of the tanks were metal. The tanks were removed by Carmen Ciello Construction Company and transported to Whitney Barrel.
5/16/1988	200-218 Union Street	Hoffmans giving up license to store gasoline. Tanks are all out of ground.

Based on records maintained at the City of Lynn Fire Department, AGTs and USTs have historically been used at the Site to store fuel oil to heat on-Site buildings. Records additionally indicate that gasoline was stored on-Site. Gasoline was likely stored in the USTs removed from the Site in 1985. No documentation regarding confirmatory sampling following the removal of USTs was found.

5.2 Floor Drains and Storm Water Drains

The Site was inspected for the presence of catch basins, dry wells, storm drains, or floor drains. Provided below is a summary of the findings.

Floor Drains and Storm Water Drains	Yes / No	Description
Source of information: Site inspection	Yes	
Source of information: Site plans or building plans	No	The building formerly located at the Site has been demolished and disposed of off-Site.

Floor Drains and Storm Water Drains	Yes / No	Description
Are there floor drains present? If yes, indicate location	No	
Is the discharge point of the floor drains known?	N/A	
Are floor drains near OHM use, storage, generation, treatment, or discharge locations?	N/A	
Is there any evidence of a release or staining near the floor drain(s)?	N/A	
Are the floor drains sealed?	N/A	
Are there dry wells, catch basins or storm drains present? If yes, indicate location.	No	
Is the discharge point of the dry wells, catch basins or storm drains known?	N/A	
Are the dry wells, catch basins or storm drains near or connected to OHM use, storage, generation, treatment, or discharge locations?	N/A	
Is there any evidence of a release or staining near the dry wells, catch basins or storm drains?	N/A	
Are the dry wells, catch basins or storm drains sealed?	N/A	

5.3 Asbestos Containing Materials (ACM)

During the Site inspection, GEC made observations for building materials likely to be ACM. Sample collection and confirmatory optical analyses were not performed, and were beyond the scope of this investigation.

During the Site inspection, the only former building materials observed on the Site were debris piles of scrap metal and wood. No suspect ACM was encountered during the survey. Prior to the demolition of the building, an Asbestos Survey and Asbestos Removal were conducted at the Site by SCS Environmental under the supervision of Envirotest Laboratory. Materials that comprised the former building were sampled and analyzed for asbestos. Any materials found to contain asbestos have been removed. Refer to Appendix E for documentation of the asbestos abatement activities.

5.4 Oil and Hazardous Materials (OHM)

This section supplements information provided in Sections 3.1 and 5.1.

OHM Use and Storage	Yes / No	Description
Is OHM use and storage limited to consumer quantities of cleaning materials, paints and similar products, unless otherwise indicated in Section 3.1 or 5.1?		The parcel is currently vacant. No oil, hazardous materials, cleaning materials, paints, or similar products are currently used at the Site.
Are there any hazardous material storage permits?	No	
Are there Material Safety Data Sheets maintained on-Site?	No	
Is there a Community Right-to-Know plan on-Site?	No	
Are there safety plans; preparedness and prevention plans; spill prevention, counter measure, and control plans?	No	

5.5 Waste Oil and Hazardous Waste

During the Site inspection, GEC made observations for evidence of the treatment, storage, disposal, or generation of hazardous waste and waste oil, including the improper disposal of oil or hazardous material.

Waste Oil and Hazardous Waste	Yes / No	Description
Is waste oil or hazardous waste generated on-Site?	No	
Is waste oil or hazardous waste treated, stored or disposed on-Site?	No	
Does the Site have any hazardous waste disposal permits?	No	
How are the wastes disposed, recycled, reclaimed or treated?	N/A	
Is there documentation of the RCRA status of the Site?	No	
Are there any known historic incidents of improper disposal of OHM?	No	
Is there any visual evidence of improper OHM disposal?	No	
Based on Site interview, are there any known violations relative to waste oil and hazardous waste practices?	No	

5.6 Solid Waste

During the Site inspection, GEC made observations for evidence of proper and improper solid waste disposal at the Site.

Solid Waste	Yes / No	Description
Where and how is solid waste stored on-Site?		Currently the only solid waste located on-Site is demolition debris from the former Site building. Demolition debris is currently segregated by type (i.e. wood, metal) into piles located on-Site.
Who transports solid waste off-Site?		All demolition debris is in the process of being removed from the Site by Robert's Dismantling & Recycling.
Does the Site have any solid waste disposal permits?	No	
Are there any known historic incidents of improper disposal or OHM?	No	
Is there any visual evidence of improper solid waste disposal?	No	
Based on Site interview, are there any known violations relative to solid waste practices?	No	
Did any information suggest that filling occurred at the Site, before, during or following Site development?	Yes	The Site is currently undergoing filling and re-grading. Robert's Dismantling & Recycling is currently transporting fill dirt onto the Site to fill in the former basement areas to even out the grade of the Site.

5.7 Wastewater

During the Site inspection, GEC made observations for evidence of the generation, treatment, or discharge of wastewater, including the improper disposal of wastewater.

Wastewater	Yes / No	Description
Is wastewater generated on-Site?	No	No wastewater is currently generated at the Site.
Is the wastewater limited to sanitary wastewater?		Based on conversations with Mr. Gateman, prior to the fire in August 2001, wastewater at the Site was formerly limited to sanitary wastewater.
To where is the sanitary wastewater disposed?		Sanitary wastewater had previously been disposed to the city sewer.
Is there any process or industrial wastewater?	No	

Wastewater	Yes / No	Description
Are there any wastewater permits for connections to municipal sewer systems; NPDES permits; groundwater discharge permits; storm water permits; or other wastewater discharge, treatment, storage or recycling permits?	No	
Are there any monitoring, reporting or treatment requirements associated with the permit(s)?	N/A	
How is the wastewater generated, and what volume is generated per unit time?	N/A	
Does or did the wastewater contain OHM?	N/A	
How is the wastewater disposed, recycled, reclaimed or treated?	N/A	
Is or has the wastewater ever been disposed on-Site?	N/A	
Are there any known historic incidents of improper disposal of OHM?	No	
Has the wastewater ever been discharged to the ground, on-Site septic system, dry well, floor drain, catch basin or storm drain?	N/A	
Is there any visual evidence of improper wastewater disposal?	No	
Based on Site interview, are there any known violations relative to waste oil and hazardous waste practices?	No	

5.8 Polychlorinated Biphenyls (PCBs)

During the Site inspection, GEC made observations for equipment likely to contain PCB oil. Equipment likely to contain PCB oil includes electrical transformers, capacitors, hydraulic equipment and oil switches. Dry-type transformers typically do not contain PCBs.

PCB Equipment	Yes / No	Description
Are there any pad-mounted transformers on-Site? If yes, indicate the location, approximate age, and condition.	No	
Are there any pole-mounted transformers on-Site? If yes, indicate the location, approximate age, and condition.	No	
Are there any dry-type transformers on-Site?	No	

PCB Equipment	Yes / No	Description
Are there any transformers located off-Site along the periphery of the Site? If yes, indicate the location, approximate age, and condition.	No	
Is there any evidence of leakage around the transformer(s)?	N/A	
Have the owners of the transformers been identified, and contacted regarding the PCB status of the dielectric fluid?	N/A	
Is the PCB status of the transformers known? If yes, what is the basis of that knowledge?	N/A	
Is there any other equipment located on-Site, which could contain PCB dielectric fluids, such as capacitors, hydraulic equipment, or oil switches? If yes, indicate the location, approximate age, condition, and use of the equipment.	No	
Is there any evidence of leakage around the equipment?	N/A	
Is the PCB status of the fluid in the equipment known? If yes, what is the basis of that knowledge?	N/A	
Based on Site interview, are there any known historic incidents of fires or releases from transformers or other equipment containing dielectric oils?	No	
Based on Site interview, were transformers or other equipment containing dielectric oils ever located on-Site, and removed?	No	
Based on Site interview, were PCBs used, stored or disposed on-Site?	No	

6.0 FINDINGS

At the request of Envirotest Laboratories, GEC conducted an Environmental Site Assessment of the 190-200 Union Street property located in Lynn, Massachusetts. This survey consisted of a surficial Site inspection, interviews, and review of available information at state and local agencies. GEC's investigation did not include any testing or analysis of surficial or subsurface media, or building materials. Following is a summary of known or suspect environmental conditions associated with the property.

Site Conditions

- No buildings currently occupy the Site. Prior to August 2001, the Site was occupied by a 70,000 square-foot commercial store. In August 2001, the building was destroyed in a fire, and between October 2001 and April 2002, the remainder of the building was demolished. The majority of former building materials, including asbestos containing materials, have been removed. Filling activities are currently being conducted at the Site.
- The Site is located in an area zoned commercial business district, and is surrounded by roadways, commercial properties, and parking lots.

Site History

- The Site was initially developed prior to 1887. Since that time operations have included residential and commercial businesses, including a department store, shoe stores, liquor stores, a dance hall, an undertaker, cleaners (possibly dry cleaners), bakeries, boarding houses, and a bowling alley.

Sensitive Land Uses / Environmental Resources

- No known resource areas were identified within approximately 1,000 feet of the Site. Goldfish Pond and Lynn Harbor are situated approximately 0.4-miles and 0.5-miles east and southwest of the Site respectively. Open spaces are located approximately 500-feet northeast and southeast of the Site.

Polychlorinated Biphenyls (PCB)

- No pad-mounted or pole-mounted transformers are located at or in the immediate vicinity of the Site.

Storage Tanks

- Based on Site inspection, interviews and records search via Environmental FirstSearch and town agencies, issues pertaining to current on-Site usage of storage tanks were not identified.
- Based on records obtained from the City of Lynn Fire Department, AGTs and USTs have been utilized historically at the Site for the storage of fuel oil, gasoline and possibly dry cleaning chemicals (chlorinated solvents). Based on records, eight 275-gallon AGTs, one 500-gallon UST, and one UST of unknown size were utilized at the Site from 1950 through 1988. Records document the removal of two 275-gallon AGTs, one 3,000-gallon UST, two 2,000-gallon USTs, one 500-gallon UST, and three tanks (unknown if AGTs or USTs) of unknown size. No records were found documenting subsurface conditions following UST removal.
- Records viewed via Environmental FirstSearch and town agencies located two properties with registered USTs within ¼-mile of the Site. Of these properties, none are located within approximately 0.1 miles of the Site.

Solid Waste

- Piles of solid waste (demolition debris) were observed throughout the Site. Based on conversations with Mr. Gateman, observed piles are scheduled to be removed and properly disposed off Site by Robert's Dismantling and Recycling.

Hazardous Materials and Waste

- No hazardous waste was observed.

Asbestos

- During the demolition of the burnt out building, suspect asbestos containing materials were sampled for asbestos content. Any necessary asbestos abatement was conducted by SCS Environmental under the guidance of Envirotest Laboratory. Refer to Appendix E for copies of asbestos abatement documentation.

Filesearch

- GEC found one CERCLIS site and no NPL sites within 1/2 mile of the Site. The identified CERCLIS site is located approximately 0.3 miles southwest of the Site, likely downgradient of the Site.
- GEC found seventy-six references to off-Site spills of OHM within a 1/2-mile radius of the Site. Two spills have occurred in the immediate area (less than 500-feet) of the Site.
- Twenty-one state disposal sites were found within 1/2 mile of the Site. One of these disposals sites is located within 1,000-feet of the Site.
- Based on topography and interpretation of the USGS quadrangle, groundwater flow in the vicinity of the Site is likely to the southwest.
- All releases within 1,000 feet of the Site have achieved regulatory closure. In addition, based on the apparent direction of groundwater flow, all spill incidents identified in the vicinity of the Site are likely located crossgradient and/or downgradient of the Site, and are therefore unlikely to impact the Site.

7.0 OPINION

GEC can make no definitive conclusion regarding on-Site subsurface conditions relative to a release of OHM. However, based the historic presence of gasoline and fuel oil stored in USTs and AGTs, and the partial historic use of the Site as a dry cleaners, it is GEC's opinion that the potential exists that on-Site subsurface conditions have been impacted by a release of OHM.

8.0 CONCLUSIONS

GEC has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527 of 190-200 Union Street, Lynn, Massachusetts, the property. Any exceptions to, or deletions from, this practice are described in Section 1.0 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property, except for the following:

- Historic use of on-Site gasoline USTs. Although records obtained from the City of Lynn Fire Department indicate three USTs were removed, no documents indicate confirmatory sampling, or tightness tests were performed during the removal of the USTs;
- Historic documents indicate that cleaners historically occupied the Site. Therefore, the potential for dry cleaning activities to have been conducted at the Site exists; and,
- Documentation indicates that fuel oil was historically stored in AGTs in the basements of former buildings to heat the former buildings.

9.0 WARRANTY

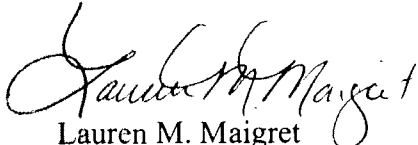
The conclusions contained in this report are based on the information readily available to GEC as of May 29, 2002. The scope of services for this investigation included those issues within the scope and meaning of ASTM Standard E 1527-00, Massachusetts General Laws, Chapter 21E and the associated Massachusetts Contingency Plan. The conclusions and recommendations may require revisions if future regulatory changes occur.

Compliance with other environmental and workplace statutes and regulations was not included in the approved scope of services. No representations regarding the condition of subsurface soils or groundwater quality at the Site can be made based on GEC's approved scope of services. GEC provides no warranties on information provided by third parties and contained herein. Data compiled was in accordance with GEC's approved scope of services and should not be construed beyond its limitations. Any interpretations or use of this report other than those expressed herein are not warranted.

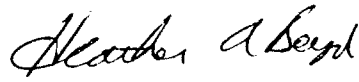
The use, partial use, or duplication of this report without the express written consent of Goldman Environmental Consultants, Inc. is strictly prohibited. This report is subject to GEC's Contract for Consulting Services with the Client.

Respectfully submitted,
Goldman Environmental Consultants, Inc.

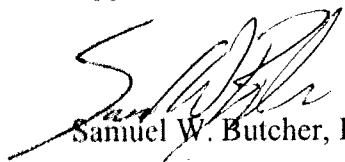
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